

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
Litigation,

No. 2:15-MD-02641-DGC

JOINT [PROPOSED] CASE  
MANAGEMENT ORDER NO. \_\_\_\_

**(Discovery Deadlines for Discovery  
Group 1 and Bellwether Group 1)**

Pursuant to Case Management Orders No. 11 [Doc. 1662], 18 [Doc. 3685], and 19 [Doc. 4311], the Court enters this Case Management Order No. \_\_\_\_ regarding scheduling for Discovery Group 1 and Bellwether Group 1.

<b>Action</b>	<b>Date/Deadline</b>
Deadline for Plaintiffs to provide dates for depositions of all Plaintiffs in Discovery Group 1 and spouse or significant family member	Dec. 30, 2017 <sup>1</sup>
Case-specific fact discovery commences in individual Discovery Group 1 cases	January 5, 2017
Deadline to complete depositions of all Plaintiffs (including those Plaintiffs with loss of consortium claims)	Feb. 16, 2017 <sup>2</sup>
End of preliminary case-specific fact discovery for Discovery Group 1 cases	April 10, 2017
Parties exchange lists of six (6) proposed selections from Discovery Group 1 for	April 17, 2017

<sup>1</sup> Plaintiffs' counsel shall make a good faith effort to obtain and provide dates on a rolling basis in advance of Dec. 30, 2017 for all Discovery Group 1 cases identified by the Parties on December 16. For cases chosen by the Court after that date, Plaintiffs will use their best efforts to obtain and provide dates within two weeks after case selection.

<sup>2</sup> The parties may extend this deadline by up to two weeks for cases selected after December 16, 2016.

Bellwether Group 1, and order of trials (per CMO 18, Sec. B).	
If the parties are unable to agree on six (6) cases to comprise Bellwether Group, the parties shall submit to the Court proposed lists and memorandum in support of their submissions and, if applicable, in opposition to the opposing party's selections (per CMO 18, Sec. B).	April 24, 2017
Responses to opposing party's memorandum regarding selection of cases for inclusion in Bellwether Group 1 (per CMO 18, Sec. B).	April 28, 2017
Commence additional case-specific fact discovery for Bellwether Group 1	Upon entry of the Court's selection of the final group of six (6) cases to form Bellwether Group 1.
Plaintiffs' case-specific expert disclosures for Bellwether Group 1	May 15, 2017 (or two weeks after Court's selection of Bellwether Group 1, whichever is later)
Defendants' expert disclosures for Bellwether Group 1	June 12, 2017 (or six weeks after Court's selection of Bellwether Group 1, whichever is later)
Case-specific rebuttal expert disclosures for Bellwether Group 1	June 26, 2017 (or eight weeks after Court's selection of Bellwether Group 1, whichever is later)
Deadline for completion of additional case-specific fact discovery for Bellwether Group 1	June 30, 2017
Deadline for case-specific expert depositions (intended to coincide with the end of common expert discovery) for Bellwether Group 1	July 14, 2017